

July 8, 1992

Final Preliminary Assessment Plus Report
Stanley Works - Hardware Division
New Britain, Connecticut

Work Order No. 4100-11-36-0007
Work Assignment No. 11-1JZZ
TDD No. 9108-75-AWE
CERCLIS No. CTD010170363

INTRODUCTION

The Roy F. Weston., Alternative Remedial Contracts Strategy (ARCS/Region I) team was requested by the Region I U.S. Environmental Protection Agency (EPA) Waste Management Division to perform a Preliminary Assessment Plus (PA-PLUS) of Stanley Works - Hardware division property in New Britain, Connecticut. Tasks were conducted in accordance with the ARCS contract, the PA-PLUS scope of work, and technical specifications provided by the EPA under Work Assignment No 11-1JZZ, which was issued to ARCS/Region I on November 11, 1991. This PA-PLUS report was completed as part of EPA's Environmental Priorities Initiative (EPI), a joint project overseen by the Resource Conservation and Recovery Act (RCRA) program and the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) program, more commonly known as Superfund.

Background information used in the generation of this report was obtained through file searches conducted at the Connecticut Department of Environmental Protection (CT DEP) and EPA, telephone interviews with town officials, and individuals knowledgeable of the property history and characteristics, and conversations with other Federal, State and local agencies. Information was also collected during the ARCS/Region I on-site reconnaissance (OSR) on March 19, 1992.

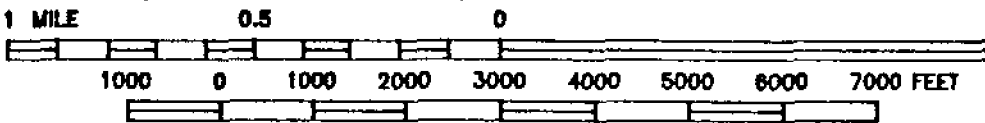
This package follows the guidelines developed under Superfund. However, these documents do not necessarily fulfill the requirements of other EPA regulations such as those under the RCRA or other Federal, State or local regulations. The PA-PLUS provides a preliminary screening of facility operations. The EPI represents an integrated RCRA/CERCLA approach to assessing facilities utilizing procedures that combine element of the Superfund Preliminary Assessment (PA) and the RCRA Facility Assessment (RFA). Under the EPI, current and former hazardous waste treatment, storage and disposal facilities regulated by the RCRA program are being evaluated to determine whether corrective action may be warranted. THE PA-PLUS is a limited effort and is not intended to supersede more detailed investigations.

SITE DESCRIPTION

The Stanley Works - Hardware Division (Stanley) is located at 100 Curtis Street, New Britain, Connecticut. The property is located at 41°40'10" north latitude and 72°50'03" west longitude (USGS 1984; Figure 1). Stanley is a manufacturer of consumer, residential, and architectural hardware products such as hinges, screws, latches, and handles (CT DEP 1991b). The property is bordered to the north by Myrtle Street, to the east by commercial and residential properties,



BASE MAP IS A PORTION OF THE FOLLOWING U.S.G.S. QUADRANGLE(S):
 NEW BRITAIN, CONNECTICUT 1984 1:24,000



LOCATION MAP
 STANLEY HARDWARE, INC.
 NEW BRITAIN, CONNECTICUT

ARCS REGION I
 CONTRACT NO. 68-W9-0018

FIGURE 1

to the south by West Main Street and to the west by Burritt Street and additional Stanley properties not included in this assessment. Commercial and residential properties surround the property to the north, east and south. Portions of the southern part of the Stanley property are occupied by Cold Metal Products and the Connecticut Light and Power Company (CL&P Co.) - (McDonnell 1992a).

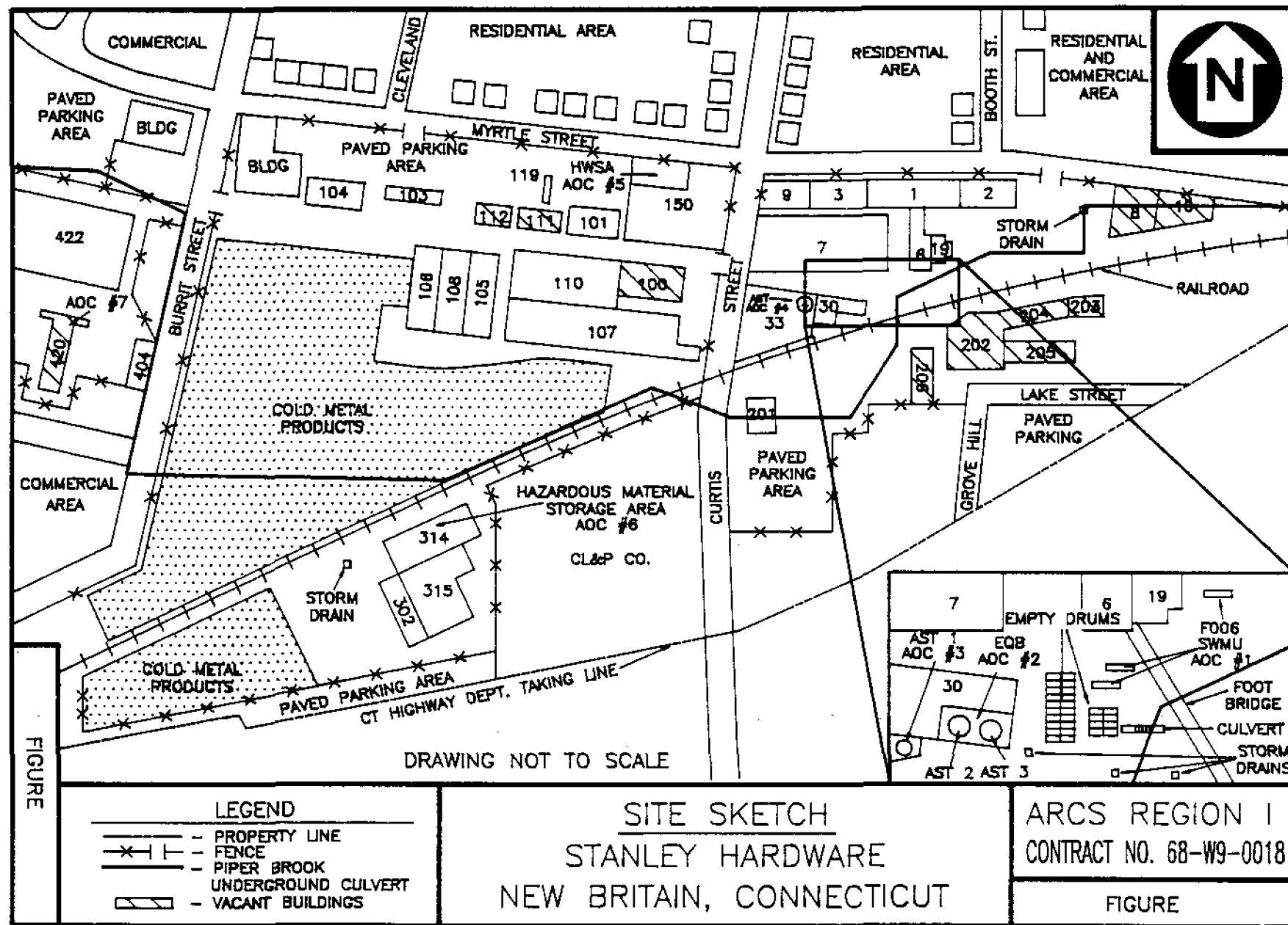
The 50.3 acre property is located in a mixed industrial, commercial and residential zoned area of New Britain (McDonnell 1992a). Stanley's hardware division consists of several buildings located east and west of Curtis Street. Buildings associated with the hardware division that are currently utilized include: 1, 2, 3, 7, 30, 33, 101, 105, 107, 108, 110, 150, 201, 302, 314, 315 (McDonnell 1992a; CT DEP 1991b; Figure 2). All of these buildings are constructed of concrete, steel and brick. No floor drains were noted in any of these buildings (McDonnell 1992a). The total utilized building space is approximately 680,000 square feet. Other Stanley buildings associated with the hardware division that are currently vacant include: 8, 10, 100, 103, 104, 111, 112, 202, 203, 204, 205, 206, and 420 (McDonnell 1992a; Figure 2). The operations that took place in vacant buildings included storage of parts and finished products, machining, plating and painting. Stanley has operated on the property since 1843.

The property is approximately 200 feet above sea level with a gradual eastward slope (McDonnell 1992a; USGS 1984). Piper Brook runs easterly underneath the property through a culvert (Figure 2). Storm drains and catch basins are located throughout the property collecting surface water runoff for discharge into Piper Brook (McDonnell 1992a).

Stanley is served by a municipal water system for drinking water and discharges sanitary wastes and treated wastewaters into the city of New Britain sewer system (CT DEP 1991b). There are four water supply wells located on the Stanley property which supply process and cooling waters for Stanley's operations (CT DEP 1991b; McDonnell 1992a). The supply wells are located on the Stanley property west of Burritt Street (McDonnell 1992a). No analytical data regarding these wells was available from file reviews or the Stanley representative.

There are paved parking areas located along Myrtle Street, Curtis Street, Lake Street, and Burritt Street. Vehicular and pedestrian access to the property are at guarded and monitored gates located on Myrtle Street, Curtis Street and Burritt Street. Access to other areas is restricted by chain link fencing. Railroad tracks run east to west through the Stanley property and cross at Curtis Street (McDonnell 1992a).

Stanley maintains a storage area for roll-off containers (AOC #1) used for the collection of metal hydroxide sludge (F006) next to Buildings 6 and 19 (McDonnell 1992a). The OSR revealed three 15 cubic yard roll-offs that are hauled by Franklin Environmental Services (McDonnell 1992a; CT DEP 1991b). Empty 55 gallon drums, that were used for raw chemical storage, were also noted in the same area during the OSR (McDonnell 1992a).



A wastewater treatment system (WWTS) that treats aqueous plating process waste is located in Building 30 (McDonnell 1992a; Figure 2). The WWTS, which has been in operation since the 1960's is permitted to discharge into the City of New Britain sewer system (CT DEP 1990d).

An equalization basin (EQB) (AOC #2) was observed outside the south side of Building 30 (Figure 2). The EQB is an approximately 51 feet long by 20 feet wide and 7 feet high (55,000 gallon) concrete rectangular tank with an epoxy lining used for holding dilute rinsewaters from the metal finishing operations prior to treatment (treatment consists of neutralization, precipitation, flocculation, clarification, sludge thickening and dewatering and filtration. During the OSR small cracks on the outside walls of the EQB were identified. Staining was identified along and in the areas of the cracks on the concrete walls. A 4,000 gallon steel bulk storage tank containing sulfuric acid (AST 2) and a 10,000 gallon fiberglass lad steel bulk storage tank containing sodium hypochlorite (AST 3) are mounted on the side of Building 30 above the EQB (McDonnell 1992a).

A 5,000 gallon fiberglass hydrochloric acid storage tank (AOC #3) is located to the west of the EQB and outside of Buildings 30 and 33 (Figure 2). Secondary containment consists of a 25 foot long by 13 foot wide by 4 foot high concrete wall with an epoxy lining. Cracks in the concrete wall and rust-colored staining along the cracks were also identified (McDonnell 1992a).

Stanley has two aboveground storage tanks (AOC #4) located in building 33. Nickel plating solution is stored in one of two 4,000 gallon steel tanks located approximately 12 feet above floor level. The second tank was empty at the time of the OSR. Both tanks are used in a recycling process to recirculate nickel plating solution. The two tanks have no secondary containment other than the building itself. No floor drains were noted in Building 33 (McDonnell 1992a).

Stanley maintains a hazardous waste drum storage area (AOC #5) on the ground floor of Building 150 (Figure 2). The hazardous waste drum storage area, which has been in operation since 1990, contains waste acids, alkaline solutions, and cyanide liquids. The OSR revealed seven 55 gallon drums of cyanide waste, ten 55 gallon drums of acid waste, and nine 55 gallon drums of alkaline waste. Secondary containment of the hazardous waste drum storage area is constructed of a four inch high concrete berm. Each of the designated wastes are segregated by a four inch high concrete berm. The overall containment area is approximately 50 by 25 feet (McDonnell 1992a).

The cyanide wastes generated by Stanley are shipped off-site by Cyanoken, Inc. and Clean Harbors of Braintree, Inc (EPA 1991). Alkaline and acid wastes are shipped off-site by Laidlaw Environmental Services and Connecticut Treatment Corp (EPA 1991).

Also included in AOC #5 is the virgin material storage area south of the hazardous waste drum storage area in Building 150. The OSR revealed twenty-one 55 gallon drums of water base

paints, fourteen 15 gallon containers of sulfuric acid, and six 55 gallon drums of waste oil stored in this area. No secondary containment was observed for this drum storage. An empty drum crusher, and small amounts of laboratory waste are located in the southwestern corner of the building adjacent to the virgin material storage area. This area also is used as an accumulation area for waste chromium solutions, waste alkaline solutions and waste paint materials. The OSR revealed one 55 gallon drum of waste chromium solution, one 55 gallon drum of waste alkaline solution and one 55 gallon drum of waste paint material; all of which were partially filled. There is no secondary containment for this accumulation and consolidation area (McDonnell 1992a).

A second hazardous material storage area (AOC #6) is located in Building 314. The revealed two 55 gallon drums of sodium zinc cyanide, two 55 gallon drums of sodium copper cyanide and 400 pounds of sodium cyanide stored in this area (McDonnell 1992a). Secondary containment consists of a four inch high concrete berm with chain link fencing and a lockable gate (McDonnell 1992a).

A former hazardous waste drum storage area (AOC #7), is located in Building 420 (Figure 2). Building 420 was a regulated unit for hazardous waste drum storage and has been going through closure since 1990 (CT DEP 1991b; McDonnell 1992a). This area had a maximum capacity of 1,092 drums, two 20 cubic yard roll-offs and two 2,500 gallon steel aboveground storage tanks (CT DEP 1991b). During the OSR, lime-yellow colored stains were identified on the floor in several areas (McDonnell 1992a). The truck bay, which contained two 20 cubic yard roll-offs, located in the northeastern part of the building, is approximately four feet below the level of the storage area. Building 420 has two self contained sumps for spills; one in front of the overhead doorway of the truck bay and one in the center of the building (McDonnell 1992a).

Wastes stored in Building 420 described in a 1984 RCRA Inspection Report included: cyanide wastes, chromium sludge, 1,1,1-trichloroethane, acids and acid sludges, alkaline wastes, solvent base paints - solids, water base adhesive (permuthane adhesive), nickel stripper and sludge, coke breeze, oily sludge, and grinding sludge (CT DEP 1984b).

An outside hazardous waste drum storage yard (AOC #8) was located west of Building 420 in between Buildings 400 and 401. This outside storage yard was in use from 1963 to 1984 (CT DEP 1983b, 1984b). According to a 1983 RCRA inspection report, the yard contained approximately 500 drums of cyanide wastes, acid and alkaline wastes and sludges. Approximately 35 percent of the drums were rusted, uncovered or leaking (CT DEP 1983b). The drums were stored on a permeable base of brick and soil without secondary containment (CT DEP 1983b). Dark stained soil was identified in the area of the drums (CT DEP 1983b). The area is now a vacant grass and dirt lot (McDonnell 1992a).

Building 201 houses the boiler. This boiler is powered by fuel oil and serves the entire plant via steam lines in an underground tunnel network. Natural gas lines and electrical conduits also

traverse these tunnels (McDonnell 1992a).

An area outside of Building 201 has historically been used for storage of #2 fuel oil in nine underground steel storage tanks (USTs) (AOC #10). Three 20,000 gallon USTs were installed in January and July 1950 and one 30,000 gallon UST was installed in May 1962. These four tanks were removed in May and October 1988. One 30,000 gallon UST was installed in May 1962 and has been abandoned since June 1989. Two 30,000 gallon steel USTs, installed in May 1962, and one 30,000 gallon fiberglass steel clad UST, installed October 1988, are still in use. A 2,000 gallon steel UST installed in January 1950, has been abandoned since August 1973 (CT DEP 1991c).

According to CT DEP records, a 5,000 gallon UST containing fuel oil and one 525 gallon UST (AOC # 10) containing petroleum naphtha, were installed and removed in January 1950 (CT DEP 1991c). Stanley representatives were not aware of the former locations of these tanks. A 1,000 gallon UST containing fuel oil, located west of Building 150, was installed January 1950 and removed December 1987. A 2,000 gallon steel UST containing gasoline, located east of Building 100, was removed in 1991 (McDonnell 1992a).

Three monitoring wells were installed in the area of the gasoline UST. According to the Stanley site contact, sampling of these wells was performed and the results indicated the presence of gasoline in the groundwater. Other monitoring wells are located in the area of the USTs near the boiler house (building 201). According to the Stanley site contact, there is no analytical data available for the monitoring wells near the boiler house (McDonnell 1992a).

Twelve Areas of Concern (AOCs) were identified during the OSR of the Stanley property. Table 1 summarizes the AOCs noted on the Stanley property. AOCs are fully described in Appendix A.

Table 1
Areas Of Concern Summary

Area of Concern (AOC)	AOC Description	Start-Up/ Closure Dates	Release Status	References
#1 - F006 Dumpster Area	Three 20 yd ³ dumpsters containing F006 wastes located outside of Buildings 6 and 19.	1960's-Present	High Potential of Release	McDonnell 1992a
#2 - Equalization Basin (EQB)	55,000 gallon concrete holding tank which receives dilute rinses and pre-treated rinses. Sulfuric acid and sodium hypochlorite dump tanks bleed into EQB.	1960's-Present	Evidence of Release	McDonnell 1992a
#3 - Aboveground Storage Tank (AST 1)	5,000 gallon fiberglass tank containing hydrochloric acid.	Unknown-Present	High Potential of Release	McDonnell 1992a
#4 - Aboveground Storage Tanks (AST 4)	Two 4,000 gallon steel tanks containing nickel plating solution.	Unknown-Present	Low Potential of Release	McDonnell 1992a
#5 - Hazardous Waste and Virgin Product Drum Storage Area	Hazardous wastes stored include acids, alkaline solutions and cyanide liquids. Secondary containment consists of a four inch high concrete berm segregating each waste type. Virgin materials are stored in an area located outside of bermed waste drum area. An accumulation area for waste chromium solution, paint and sodium hydroxide, with no secondary containment, is also present.	1990-Present	High Potential of Release	McDonnell 1992a

Table 1
Areas Of Concern Summary
(continued)

Area of Concern (AOC)	AOC Description	Start-Up/ Closure Dates	Release Status	References
#6 - Hazardous Materials Storage Area (HMSA)	Hazardous materials stored include sodium zinc cyanide, sodium copper cyanide, sodium cyanide, and brass cyanide. Secondary containment is constructed of a four inch high concrete berm.	Unknown-Present	Low Potential of Release	McDonnell 1992a
#7 - Former Hazardous Waste Drum Storage Building No. 420	A former area used for drum storage for hazardous waste.	1984-1990	High Potential of Release	McDonnell 1992a
#8 - Former Hazardous Waste Drum Storage Yard	A former drum storage area which contained approximately 500 drums. The CT DEP noted that 35 percent of the drums rusted, were uncovered or leaking. No secondary containment for storage area existed.	1963-1984	Evidence of Release	CT DEP 1983b
#9 - Plating Lines	Plating operations utilize acids and alkaline solutions, chromium solutions, zinc chloride, cyanides and nickel. Plating lines are located in Buildings 7, 33 and 314.	1902-Present	Evidence of Release	McDonnell 1992a
#10 - Underground Storage Tanks	One 1,000 gallon tank Two 2,000 gallon tanks One 5,000 gallon tank Three 20,000 gallon tanks Five 30,000 gallon tanks	1950-1991	Low Potential of Release	CT DEP 1991c

Table 1

**Areas Of Concern Summary
(concluded)**

Area of Concern (AOC)	AOC Description	Start-Up/Closure Dates	Release Status	References
#11 - Painting Operations	Painting operations occur in Buildings 1, 3, 7 and 107. Painting processes include paint dip lines, which use curing ovens to dry the painted parts and spray paint booths.	Unknown-Present	Evidence of Release to Air	McDonnell 1992a
#12 - Degreaser Units	Two degreasing units that use 1,1,1-trichloroethane are located in Building 7.	1970's - Present	Low Potential of Release	McDonnell 1992a

ACTIVITY/HISTORY

According to the CERCLIS listing, Stanley (EPA ID CDT01070363) is listed under the address of 195 Lake Street, New Britain, Connecticut. However, file reviews and conversations with a Stanley representative, revealed that an address change was made to 100 Curtis Street (McDonnell 1992b).

Stanley has owned and been operating on this property since 1843. Stanley's operations and processes include forming, stamping, cutting, blanking, drilling, grinding, electroplating, parts cleaning, painting, lacquering and buffing. These operations and processes are located in several of Stanley's buildings and on various floors. The following text describes Stanley's principal operations and associated buildings:

Plating Operations

Plating operations occur in Buildings 7, 33 and 314. Stanley maintains a zinc barrel line as a plating line in Building 7. The zinc barrel line is a plating process that uses hydrochloric acid, sodium hydroxide, rinse waters for the cleaning of parts, chromium solution, and zinc chloride. Waste rinse waters, spills and drippings collect in a concrete trenches beneath the plating lines. The trenches are pitched towards a floor sump from where the waste liquids are piped to the

wastewater treatment system in Building 30 (CT DEP 1991b; McDonnell 1992a). A 320 gallon steel rectangular reserve tank that contains hydrochloric acid is located next to the zinc barrel line. Secondary containment consists of a 9 foot long by 9 foot wide by 1 foot high concrete berm (McDonnell 1992a).

The second floor of Building 7 has a brass cyanide line that uses hydrochloric and muriatic acids, sodium hydroxide cleaners, nickel, and brass cyanide. A hand plating line, which is a manual plating line for customized parts, uses chromium, zinc chloride, nickel, copper cyanide, brass cyanide, and various acid and caustic cleaners. A cold galvanizing unit uses sulfuric acid, a glass medium, and water. Stanley also maintains two degreasing units that use 1,1,1-trichloroethane in Building 7 (AOC #12) (McDonnell 1992a, CT DEP 1991b).

Stanley eliminated a brass cyanide barrel line in Building 33 in July 1991 (CT DEP 1991b). Baths, cleaners and rinses were disposed of and the dip tanks were removed. The concrete floor was cleaned and the concrete pad which supported the plating line was removed. Analytical data concerning the concrete was not available. the Stanley maintains another plating line in Building 33 that utilizes a nickel plating solution using brass cyanide, sulfuric acid, sodium hydroxide, and rinse waters (CT DEP 1991b; McDonnell 1992a). Stanley also maintains a plating line that uses brass cyanide, sodium zinc cyanide, sodium copper cyanide, sodium cyanide, and alkaline cleaners in Building 314 (CT DEP 1991b; McDonnell 1992a).

Painting and Lacquering Operations

Painting operations (AOC #11) occur in Buildings 1, 3, 7 and 107. Lacquer operations occur in Buildings 7, 33 and 315. Stanley's painting processes include paint dip lines, which use curing ovens to dry the painted parts and are vented to the outside, and spray paint booths. According to the Stanley contact, these operations have air permits. However, no permits were found during the file search dealing with Clean Air Act compliance. Cleaning lines that are used to prepare parts prior to the painting utilize sodium hydroxide and rinse waters. Rinse waters are discharged to the wastewater treatment system (McDonnell 1992a). Stanley's lacquer operations include parts cleaning line, lacquer dip lines and curing ovens. As of June 30, 1991, all paints have been converted to water-based products. Stanley no longer uses lacquer thinners, toluene and methyl ethyl ketone (CT DEP 1991b).

Forming, Stamping, Cutting, Blanking, Drilling, and Grinding

Machining processes occur in Buildings 105, 107, 150, 302 and 315. Stanley maintains a press room in Building 108 where parts are formed and stamped. Waste lubricating oils collect in a concrete pit located under the press machines and are pumped out into 55 gallon drums and temporarily stored at the waste transfer station. Other wastes stored in this area are water/oil mixtures and oil cover rags (McDonnell 1992a). Machining operations involve the use of machining and lubricating oils, some of which are water soluble. Waste oils are collected and

stored in 55 gallon drums and shipped off-site to United Industrial Services (CT DEP 1991b).

A review of CT DEP files, RCRA files and discussions with Stanley revealed that both hazardous and non-hazardous wastes are generated at the company. Waste materials are stored in designated hazardous waste storage areas. Table 2 summarizes the wastes generated by Stanley, average yearly quantities, years of use and source areas.

Building 4 has been demolished because of the corroded concrete from the plating line on the fourth and fifth floors. Demolition was performed into segregated piles of hazardous and non-hazardous material. Demolition was performed by Clean Harbors in 1991 and approximately eighty-five 30 ton roll-off dumpsters were shipped as F007 and F009 wastes (CT DEP 1991b).

Building 6, which has not been used for any type of chemical storage since spring 1991, is slated for demolition (CT DEP 1991b). Building 6 had been used as a short term accumulation area (CT DEP 1991b). Other Stanley buildings that have been demolished from 1989 to 1991 include Buildings 5, 11, 14, 20, 20 1/2, 21, 23, 23, 25 and 26 (CT DEP 1991b). Appendix C provides a site drawing of previous building locations on the Stanley property. Stanley formerly maintained plating operations and parts and finished products storage in these demolished buildings. The disposal activities of the demolition debris for these buildings are unknown. The copperas sulfate plant (Buildings 305, 312 and 316) was also demolished and disposal activities were performed by Hygienics, Inc. (CT DEP 1991b). No analytical data regarding the demolition debris was available.

Table 2
Hazardous Waste Quantity

Substance	Quantities or Volume/Year	Years of Use/Storage	Years of Disposal	Source Area
1,1,1-Trichloroethane, (F001)	275 gal	1950-Present	NA	Second floor of Building 7
Methylene Chloride (F001)	220 gal	1970-1980	NA	Paint Dip Lines
Paint Waste Solids (F002, D035)	5,200 lbs	1950-Present	NA	Paint Dip Lines; Spray Paint Booths
Methyl Ethyl Ketone (F005)	490 gal	Unknown-1950	NA	Paint Dip Lines
Metal Hydroxide Sludge (F006)	560 yd ³	1986-Present	NA	WWTS in Building 30
Cyanide Liquids and Solids (F007, F008, D002)	Liq: 3,905 gal Solids: 47,500 lbs	1840's-Present	NA	Plating Lines
Sodium Hydroxide (D002)	10,430 gal	Unknown-Present	NA	Plating Lines
Hazardous Waste Liquid (F006, D007)	40,339 gal	1840's-Present	NA	Plating Lines
Chromic Acid (D002, D007)	910 gal	1940s-Present	NA	Plating Lines
Hazardous Waste Liquid (D007)	4,944 gal	1840s-Present	NA	Nickel Baths
Hydrochloric and Selenious Acids (D002, D010)	2,145 gal	1970-Present	NA	Plating Lines
Ammonium Hydroxide (D002)	55 gal	Unknown-Present	NA	Plating Lines
Alkaline Liquid (D002, D007)	1,650 gal	Unknown-Present	NA	Plating Lines
Phosphoric Acid (D002)	165 gal	1940-Present	NA	Plating Lines
Waste Cyanide Solid (D003, D007, F007, F008, P029)	9,287 lbs	1840s-Present	NA	Plating Lines

Table 2

**Hazardous Waste Quantity
(concluded)**

Substance	Quantities or Volume/Year	Years of Use/Storage	Years of Disposal	Source Area
Hazardous Waste, Liquid and Solid (D002, D006, D007, D008)	Liq: 1,860 gal Solid: 9,200 lbs	1840s-Present	NA	Plating Lines
Nickel Sulfate Salts	8,880 lbs	1930-Present	NA	Plating Lines

Sources: (CT DEP 1991b, McDonnell 1992a, 1992g)

N/A = Not Available. Dates will be provided by OSR contact and included in site files.

Stanley Hardware is a RCRA Part A Large Quantity Generator, and a RCRA interim status Storage Facility. Stanley holds a NPDES permit for discharge of an average flow of 400,00 gallons per day (gpd) of treated wastewaters and non-contact cooling water, generated from the various plating operations to the City of New Britain municipal sewer system. The NPDES permit requirements include aluminum, chromium, copper, iron, lead, tin, zinc, oil and grease, total suspended solids and cyanide monitoring (CT DEP 1990d). Monitoring data was not available from the Stanley representative. Table 3 summarizes additional regulatory activities since 1970.

Table 3
Regulatory Activities

Activity	Date	Description
Order No. 833 CT DEP	March 16, 1970	Order to eliminate direct and indirect wastewater discharge to Piper Brook watershed, and to install pretreatment facilities of wastewaters from various metal finishing operations to the City of New Britain municipal sewerage system.
NPDES Permit No. CT0001147	August 19, 1974	Permit issued for the discharge of treated wastewaters at an average flow of 180,000 gpd into Piper Brook.
Order No. 2418 CT DEP	October 31, 1978	Order to remove clean water discharges from the Mattabassett District Commission sewer system, and to install treatment facilities of the wastewaters from various metal finishing operations.
Order No. 2418 Modified CT DEP	December 4, 1979	Order to verify that treatment facilities have been placed in operation in regards to Order No. 2418, dated October 31, 1978.
Order No. 2418 Modified CT DEP	May 15, 1981	Order to verify that treatment facilities have been placed in operation in regards to Order No. 2418, dated October 31, 1978.
Order No. HM-72 CT DEP	December 29, 1983	Order to cease the release of hazardous and toxic waste into the environment and bring all waste handling procedures into compliance with the State Hazardous Waste Management Regulations.
Notice of Violation No.'s 10615, 10616, 10617, 10618, 10619 CT DEP Air Compliance	July 23, 1985	Violation for various organic compound emissions that exceeded the limits allowed by the Administrative Regulations for the Abatement of Air Pollution.
NPDES permit State Application No. 86-199	November 10, 1986	Permit issued for the discharge of treated metal finishing wastewater of an average flow of 400,000 gpd, from the Hardware Division treatment plant to the City of New Britain Municipal Sewerage System.
Consent Order No. WC3582	May 18, 1987	Order to remove clean water discharges from the Mattabassett District Commission sewer system and to install treatment facilities of the wastewaters from various metal finishing operations, to be discharged at an average flow of 400,00 gpd to the City of New Britain Sewerage System.

Table 3
Regulatory Activities
(concluded)

Activity	Date	Description
Notice of Violation No. 11441 CT DEP Air Compliance Unit	February 11, 1988	Violation for emission of dense black smoke of 80 percent opacity from stacks of boilers.
Notice of Violation No. 11905 CT DEP Air Compliance Unit	August 8, 1989	Violation for various organic compound emissions that exceeded the limits allowed by the Administrative Regulations for the Abatement of Air Pollution.
NPDES permit No. SP0000121	November 8, 1990	Permit issued for the discharge of treated metal finishing wastewater of an average flow of 400,000 gpd, from the Hardware Division treatment plant to the City of New Britain Municipal Sewerage System.

Sources: (CT DEP 1970, 1974, 1985c, 1985d, 1985e, 1985f, 1985g, 1986, 1988, 1989c, 1990d)

In addition, there were several chemical and oil reports from the CT DEP dating from 1979 to 1990. Table 4 summarizes spills and discharge activity on the Stanley property.

Table 4
Spills Summary

Date	Substance/Quantity	Cause	Environmental Impact
September 4, 1979	100 - 200 gal. sulfuric acid	Off loading hose broke.	Storm drain to Piper Brook
March 29, 1982	Unknown amount of sulfuric acid.	Faulty gasket at piped connection.	Storm drain to Piper Brook
April 7, 1984	1,000 gal metal finishing wastewater.	Unauthorized entry into treatment building and manipulation of controls caused Equalization Basin to overflow.	Storm drain to Piper Brook
March 12, 1985	200 gal. No. 6 fuel oil	Tank overfill.	Storm drain to Piper Brook
June 3, 1985	100 - 200 gal. rinse water from brass plating and copper-tin line.	Two discharge pump drive motors tripped on overload causing overflow from sump.	None
October 8, 1987	25 gal. washwater from electroplating operation.	Hose failure.	None
September 13, 1989	50 gal. hydrochloric acid	Tank overfill.	None
October 10, 1989	100 gal. wastewater	Tank overfill.	Storm drain to Piper Brook
February 27, 1990	500 gal. No. 6 fuel oil	Transfer line failure.	None
May 30, 1990	15 gal. sodium hypochlorite	Hose failure.	Storm drain to Piper Brook
November 12, 1990	20 gal. rinse waters from electroplating operations.	Overflow of sump.	Piper Brook
May 2, 1991	55 gal. chromium rinse water	Sump pump failure.	Storm drain to Piper Brook

Sources: (CT DEP 1979, 1982a, 1984, 1985a, 1985b, 1987a, 1989a, 1989b, 1990a, 1990b, 1990c, 1991a)

ENVIRONMENTAL SETTING

Stanley Hardware is located in the Connecticut Valley Lowlands. A surficial geology map of New Britain quadrangle describes the surficial deposits in the area as artificial fill consisting of till, sand and gravel (Simpson 1959). Immediately north of Myrtle Street and south of West Main Street the surficial geology consists of ground moraine deposits comprised of till and stratified drift (Simpson 1959).

The bedrock in the area consists of the East Berlin Formation and Holyoke Basalt (Simpson 1966). The East Berlin Formation is described as a pale-reddish-brown to grayish-red interbedded sandstone, siltstone, and silty shale. Holyoke Basalt is described as a dark gray or greenish gray, fine to medium grained basalt. The Holyoke Basalt is present under western portions of the property, while the East Berlin Formation underlies eastern parts of the property (Simpson 1966). A fault runs through the property in a northeast to southwest direction and intersects at approximately the midpoint of Curtis Street (Simpson 1966).

The property is located in the Park Regional Basin in the Piper Brook sub-regional basin. The Park Regional Basin covers approximately 50,700 acres and is located in the Connecticut Major Basin. According to the Connecticut Groundwater Classification Map (1987), the groundwater beneath the property is classified as GB, which indicates that the groundwater is presumed not to be suitable for direct human consumption without treatment due to waste discharges, spills or leaks of chemicals, or land use impacts. These groundwaters occur within highly urbanized areas or areas of intense industrial activity where public water supply service is available. The State's goal is to prevent further degradation (CT DEP 1987b).

The overland flow most probable point of entry (PPE) is into Piper Brook (McDonnell 1992a). Piper Brook flows in an underground concrete culvert beneath the Stanley property (Figure 2) and becomes an open surface water approximately one and three-quarter miles downstream (USGS 1984). Piper Brook has a surface water classification of B which indicates that it is known or presumed to meet water quality criteria which support the following designated uses: recreational use, fish and wildlife habitat, agricultural and industrial supply, and navigation. The State's goal is to prevent further degradation (CT DEP 1987b).

Approximately six and one-third miles downstream, Piper Brook converges with the Park River which has a surface water classification of C/B, which indicates that it is presently not meeting water quality criteria or not supporting one or more designated uses due to pollution. The State's goal is to achieve Class B water quality criteria or designated uses (CT DEP 1987b). Portions of Park River are channelized. Approximately ten and one-half miles downstream Park River converges with Connecticut River which has a surface water classification of SC/SB, which indicates that it is presently not meeting water quality criteria which support one or more designated uses due to pollution. The State's goal is to achieve Class SB water quality criteria on designated uses (CT DEP 1987b). There are no known drinking water intakes along the 15 mile downstream migration pathway.

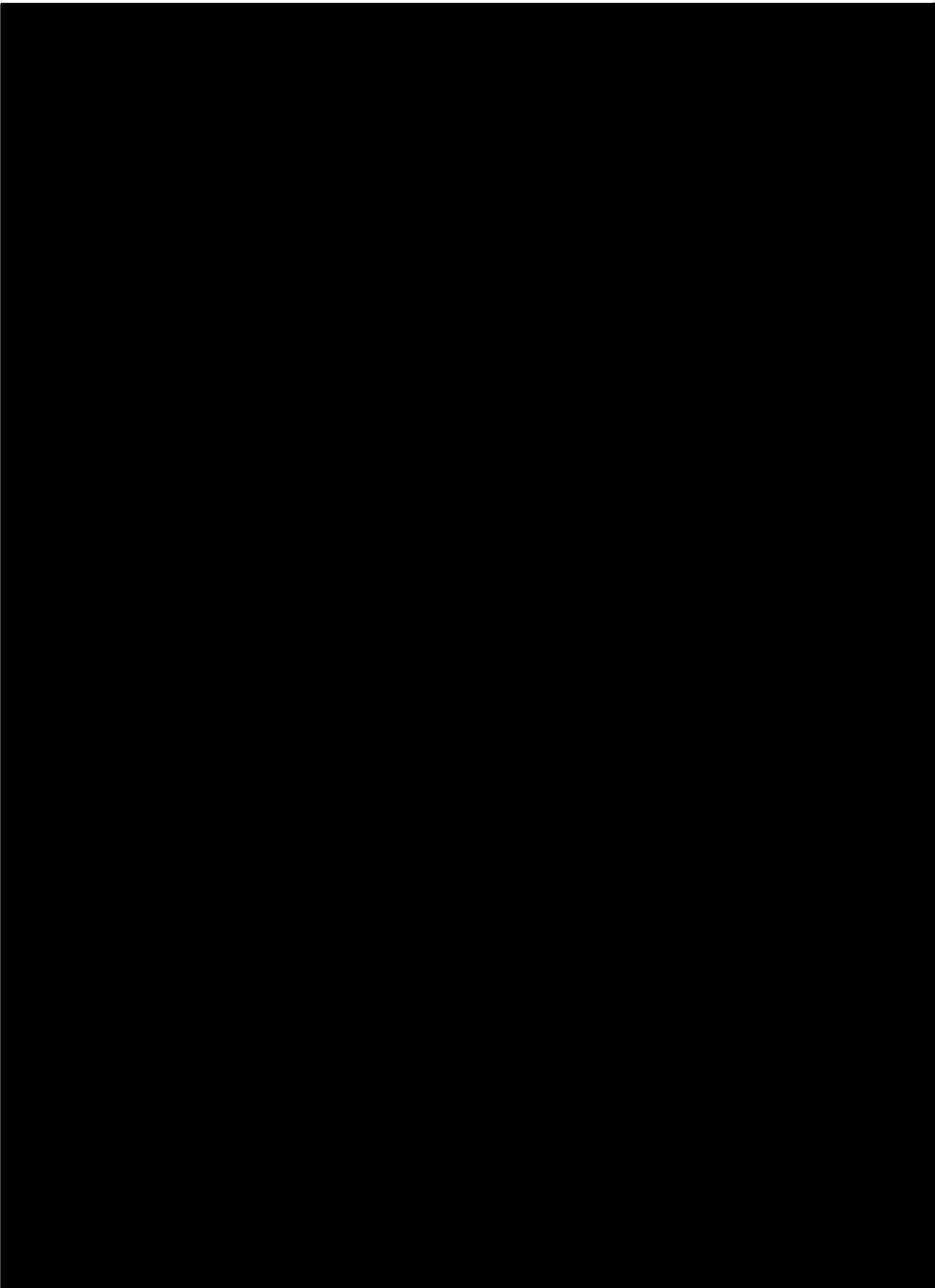


Table 5
Public Groundwater Supply Sources Within 4 Miles
of Stanley

Distance/Direction from Stanley	Source Name	Location of Source	Approximate Population Served	Source Type
3.9 miles NNE	Maple Ridge Farm Water Associates (1 well)	Farmington	160	Unknown
3.4 miles N	Hill Top, Inc. (1 well)	Farmington	160	Unknown
3.5 miles S	Kensington Fire Dist. Water Dept. (1 well)	Berlin	11,000	Unknown
2.0 - 2.2 miles W	Angelo Tomasso, Inc. (3 wells)	Plainville	35	Unknown
2.8 - 3.2 miles WNW	Plainville Water Co. Woodford Ave. Wells (4 wells)	Plainville	19,159	Unknown
3.5 miles NW	Farmington Water Co. (2 wells)	Farmington	12,700	Unknown
TOTAL:			43,214	

Sources: (CT DEP 1982b; McDonnell 1992f)

Because of the groundwater classification within one mile is GB, no private drinking water wells could be identified. Table 6 summarizes the estimated populations served by private wells calculated within radial distance rings from the property.

Table 6

**Estimated Populations Served By Private Wells
Calculated Within Radial Distance Rings From Stanley**

Radial Distance From Site (Miles)	Approximate Population Served by Private Wells Within Ring	Approximate Population Served By Municipal Wells Within Ring
0.00 - 0.25	0	0
0.25 - 0.50	0	0
0.50 - 1.00	0	0
1.00 - 2.00	1,566	0
2.00 - 3.00	3,858	19,194
3.00 - 4.00	4,867	24,020
TOTAL:	10,291	43,214

Sources: (Cook 1992; Insall 1992a, 1992b, 1992c; McDonnell 1992c, 1992d, 1992e)

Groundwater is estimated at 10 feet beneath the ground surface. Groundwater uses within a four mile radius of the Stanley property include industrial and residential (CT DEP 1987b).

There are 12 public wells within four miles of the Stanley property (CT DEP 1982b; Figure 3). Table 5 summarizes the sources of public groundwater supply wells within four miles of the property.

There are three potential fisheries identified along the 15 mile downstream pathway (USGS 1984). Unchannelized downstream portions of Piper Brook and the Park River appear capable of supporting fish. The average Piper Brook flow is estimated as less than 10 cubic feet per second (cfs), while the Park River average flow is estimated at between 10 and 100 cfs. According to the 1992 State of the Connecticut Angler's Guide, Connecticut River is identified as a fishery (CT DEP 1992a).

Wetlands are located between three and three and one half miles down stream, between five and five and one half mile downstream, and between 14 and 15 miles downstream (USGS 1984). Endangered and threatened species and species of special concern of state and federal status have been identified between one and four miles from the property. A total of 10 species were identified. None of these species were present between 0.00 and 1.00 miles; one species occurs

between 1.00 and 2.00 miles; four species occur within 2.00 and 3.00 miles; and five species occur within 3.00 and 4.00 miles (CT DEP 1992b). Refer to Appendix B for a complete list of state and federally endangered and threatened species. The EPA Integrated Environmental Management System (IEMS) database was not available for this property.

Stanley currently employs 400 people (McDonnell 1992a). There are approximately 36 people living within 200 feet from the Stanley property (McDonnell 1992a). No schools or day-care facilities could be identified within 200 feet of the property during the OSR (McDonnell 1992a). The closest regularly occupied buildings within 200 feet of the Stanley property are those occupied by Cold Metal Products and Connecticut Light and Power at the south end of the property. An estimated 122,172 people live within a four mile radius of the Stanley property. Table 7 summarizes approximate populations located within each distance ring within a four mile radius of the Stanley property. Student and worker population data are unavailable.

Table 7

Approximate Population Within 4 Miles of Stanley

Radial Distance From Stanley (miles)	Approximate Populations
0.00 - 0.25	1,089
0.25 - 0.50	3,266
0.50 - 1.00	13,064
1.00 - 2.00	43,480
2.00 - 3.00	29,337
3.00 - 4.00	31,936
TOTAL:	122,172

Source: (CT OPM 1991)

SUMMARY

Stanley is located at 100 Curtis Street in New Britain, Connecticut. The property is located in a mixed industrial, commercial and residential zoned area of New Britain. Stanley owns and occupies several buildings associated with the hardware division located in areas bound by Myrtle Street, Burritt Street and West Main Street. The 50.3 acre property is located in a mixed

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industrial, commercial and residential zoned area. Total utilized building space on the property is approximately 680,000 square feet. Since 1843, Stanley has used the property for the manufacturing of hardware products such as hinges, screws, latches, and handles. Stanley's operations include forming, stamping, cutting, blanking, drilling, grinding, electroplating, parts cleaning, painting, lacquering and buffing.

The EQB (AOC #2), adjacent to Building 30, is a 55,000 gallon concrete rectangular tank with an epoxy lining. During the OSR, small cracks on the outside walls of the EQB were identified. Staining was identified along and in the areas of the cracks on the concrete walls. Above the EQB are two bulk storage tanks; one steel 4,000 gallon tank containing sulfuric acid and a fiberglass clad steel 10,000 gallon tank containing sodium hypochlorite.

To the west of the EQB and outside of Buildings 30 and 33 is a 5,000 gallon fiberglass storage tank that contains hydrochloric acid (AOC #3). Secondary containment consists of a 25 foot long by 13 foot wide by 4 foot high concrete wall with an epoxy lining. The OSR revealed that the bottom of the tank is situated above the height of the containment wall. Cracks in the concrete wall and staining along the cracks were also identified.

Two aboveground storage tanks, used for nickel plating storage (AOC #4), are located in Building 33. The two tanks have no secondary containment. No floor drains were observed in the building.

Stanley maintains a hazardous waste drum storage area (AOC #5) in the ground floor of Building 150. The hazardous waste drum storage area, which has been in operation since 1990, contains waste acids, alkaline solutions, and cyanide liquids. Secondary containment of the hazardous waste drum storage area is constructed of a four inch high concrete berm. Each of the designated wastes are segregated by a four inch high berm. The overall containment area is approximately 50 feet by 25 feet in dimension.

South of the hazardous waste drum storage area is the virgin material storage area. Materials stored in this area include waterbase paints, sulfuric acid, and waste oils. There is no secondary containment for these materials. Small quantities of miscellaneous lab wastes are stored in the southwestern corner of Building 150 on ground level next to the virgin material storage. The area is also used for storage of smaller quantities of waste chromium solutions, waste alkaline solution and waste paint materials. There is no secondary containment for this accumulation and consolidation area.

A hazardous material storage area (AOC #6) is located in Building 314. Hazardous materials stored in this area include sodium zinc cyanide, sodium copper cyanide, and sodium cyanide. Secondary containment is constructed of a four inch high concrete berm with a chain link lockable gate.

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Building 420 housed the former hazardous waste drum storage area (AOC #7). This former storage area has been going through closure since 1990.

From 1963 to 1984, Stanley had maintained an outside hazardous waste drum storage yard near Buildings 400 and 401. The yard contained approximately 500 drums of cyanide wastes, acid and alkaline wastes and sludges. Approximately 35 percent of the drums were rusted, uncovered or leaking and were stored on a permeable base with no secondary containment. Stained soil was identified by the CT DEP in the area of the drums.

Stanley holds a NPDES permit for the discharge of treated metal finishing wastewaters. An average daily flow of 400,000 gpd of treated wastewater is discharged from the Hardware Division treatment plant to the City of New Britain Municipal Sewerage System is permitted.

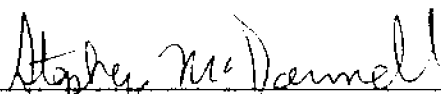
An estimated 10,291 people are served drinking water by private drinking water wells within four miles of the Stanley property. An estimated 43,214 people are served drinking water by public wells within four miles.

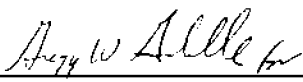
The nearest fishery to the property is Piper Brook which flows beneath the Stanley property in an underground culvert. Approximately one and three-quarter miles downstream, Piper Brook becomes an open surface water.

Wetlands are located between three and three and one-half miles down stream, between five and five and one-half mile downstream, and between 14 and 15 miles downstream. Endangered and threatened species and species of special concern of state and federal status were identified between one and four miles from the property.

At this time, EPA recommends that Stanley be deferred to the RCRA program for further evaluation.

Submitted by:


Stephen McDonnell
Task Manager


Joseph D. Mastone
Site Manager

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APPENDIX A
AOC DESCRIPTION OUTLINE

AOC DESCRIPTION OUTLINE

AOC Number: #1

AOC Name: F006 Dumpster Area

AOC Status: High Potential of Release (McDonnell 1992a)

AOC Description: The area in which the dumpsters (roll-offs) are stored is located outside of Buildings 6 and 19. Stanley uses this same area for the storage of empty 55 gallon drums. This area has a paved surface that slopes to the east and to the southeast. An opening to the Piper Brook underground culvert and two storm drains that discharge to the culvert, are located south of the dumpster and empty drum area (McDonnell 1992a).

AOC Start-up Date: Unknown. No file or site contact information available (McDonnell 1992a).

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: Stanley uses three 15 cubic yard roll-offs for the accumulation metal hydroxides wastes (F006) generated from the wastewater treatment system (McDonnell 1992a).

Release Controls: Release controls consist of the roll-off containers which is covered with a plastic tarp (McDonnell 1992a).

Release History: There are no records of releases for this AOC (McDonnell 1992a).

AOC DESCRIPTION OUTLINE

AOC Number: #2

AOC Name: Equalization Basin (EQB)

AOC Status: Evidence of Release (McDonnell 1992a)

AOC Description: The EQB is a 51 feet long by 20 feet wide by 7 feet high concrete rectangular tank with an epoxy lining. During the OSR, cracks in the concrete walls of the EQB were identified. Staining was also identified along the cracks and in other areas. Above the EQB are two bulk storage tanks, one steel 4,000 gallon containing sulfuric acid and the other a fiberglass clad steel 10,000 gallon containing sodium hypochlorite. A storm drain is located approximately 15 feet off the southeast corner of the EQB (McDonnell 1992a).

AOC Start-up Date: 1970 (CT DEP 1991b)

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: The EQB receives dilute rinseswaters from the metal finishing operations prior to treatment (CT DEP 1991b).

Release Controls: Release controls consist of transfer pumps to the clarifier and tank level alarms (CT DEP 1984).

Release History: On April 7, 1984 unauthorized entry into the wastewater treatment building and manipulation of controls caused an overflow from the EQB. Several pumps had been turned off and a circuit breaker had been opened preventing operation of dual transfer pumps and tank level alarms. With flow entering the EQB and no transfer to the clarifier, the level of the EQB rose until it overflowed. Approximately 1,000 gallons of wastewater was released (CT Dep 1984).

AOC DESCRIPTION OUTLINE

AOC Number: #3

AOC Name: Aboveground Storage Tank (AST 1)

AOC Status: High Potential of Release (McDonnell 1992a)

AOC Description: A 5,000 gallon aboveground fiberglass storage tank (AST 1) located outside of Buildings 30 and 33, containing hydrochloric acid. Secondary containment consists of a 25 foot long by 13 foot wide by 4 foot high concrete wall with an epoxy lining. Cracks in the concrete wall and staining along the cracks were also identified (McDonnell 1992a).

AOC Start-up Date: Unknown. No file or site contact information was available (McDonnell 1992a).

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: The 5,000 gallon tank contains hydrochloric acid (McDonnell 1992a).

Release Controls: Release controls consist of a 25 foot long by 13 foot wide by 4 foot high concrete wall with an epoxy lining and a tank level probe (McDonnell 1992a).

Release History: On September 13, 1989 approximately 50 gallons of hydrochloric acid was released into the bermed area. The release was the result of a faulty level gauge. No acid was discharged to the ground, waterways or storm drains (CT DEP 1989a).

AOC DESCRIPTION OUTLINE

AOC Number: #4

AOC Name: Aboveground Storage Tank (AST 4)

AOC Status: Low Potential for Release (McDonnell 1992a)

AOC Description: Two 4,000 gallon steel tanks located in Building 33 for the recycling of the nickel plating solution. The two tanks are approximately 12 feet above floor level. There is no secondary containment for these tanks (McDonnell 1992a).

AOC Start-up Date: Unknown. No file or site contact information was available (McDonnell 1992a).

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: Stanley uses the two storage tanks to recirculate (recycle) the nickel plating solution. One tank is full and empties to the plating line as the solution is needed. The solution is then pumped to the other tank where it is rejuvenated. The process is then repeated (McDonnell 1992a).

Release Controls: There are no release controls for this AOC (McDonnell 1992a).

Release History: There are no records of releases for this AOC (McDonnell 1992a).

AOC DESCRIPTION OUTLINE

AOC Number: #5

AOC Name: Hazardous Waste and Virgin Product Drum Storage Area

AOC Status: High Potential for Release (McDonnell 1992a)

AOC Description: Located on the ground floor of Building 150. Secondary containment of the hazardous waste drum storage area is constructed of a four inch high concrete berm. There are three designated areas for the hazardous wastes. Each area is segregated by a four inch high berm. The overall containment area is approximately 50 by 25 feet (McDonnell 1992a).

South of the hazardous waste drum storage area is the virgin material storage area. The OSR revealed that there is no secondary containment for this drum storage. An empty drum crusher, and smaller waste volumes consolidation area (i.e. lab volumes) is located in the southwestern corner of Building 150 on ground level next to the virgin material storage. The area also is used as an accumulation area for waste chromium solutions, waste alkaline solution and waste paint materials. There is no secondary containment for this accumulation and consolidation area (McDonnell 1992a).

AOC Start-up Date: 1990 (McDonnell 1992a)

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: The bermed area with the three designated areas contains the following hazardous wastes: seven 55 gallon drums of cyanide waste, ten 55 gallon drums of acid waste, and nine 55 gallon drums of alkaline waste. The virgin materials storage area contains twenty-one 55 gallon drums of water base paints, fourteen 15 gallon containers of sulfuric acid, and six 55 gallon drums of waste oil. The accumulation area contains one 55 gallon drum of waste chromium solution, one 55 gallon drum of waste alkaline solution and one 55 gallon drum of waste paint material; all of which are partially filled (McDonnell 1992a).

Release Controls: Release controls consist of a four inch high concrete berm for the hazardous waste drums. There is no secondary containment for virgin material storage (McDonnell 1992a).

Release History: There are no records of releases for this AOC (McDonnell 1992b).

AOC DESCRIPTION OUTLINE

AOC Number: #6

AOC Name: Hazardous Materials Storage Area (HMSA)

AOC Status: Low Potential for Release (McDonnell 1992a)

AOC Description: The hazardous material storage area is located in Building 314. Secondary containment is constructed of a four inch high concrete berm with a chain link lockable gate (McDonnell 1992a).

AOC Start-up Date: Unknown. No file or site contact information was available (McDonnell 1992a).

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: The OSR revealed virgin materials are stored at this AOC; two 55 gallon drums of sodium zinc cyanide, two 55 gallon drums of sodium copper cyanide and 400 pounds of sodium cyanide (McDonnell 1992a).

Release Controls: Release controls consist of the four inch high berm and lockable gate (McDonnell 1992a).

Release History: There are no records of releases for this AOC (McDonnell 1992a).

AOC DESCRIPTION OUTLINE

AOC Number: #7

AOC Name: Former Hazardous Waste Drum Storage Building No. 420

AOC Status: High Potential of Release (McDonnell 1992a)

AOC Description: Building 420 was a regulated unit for drum storage of hazardous wastes and has been going through closure since 1990. During the OSR, lime-yellow colored stains were identified on the concrete floor in several areas. The truck bay located in the northeastern part of the building is approximately four feet below the level of the storage area and has a sump in front of the overhead door (McDonnell 1992a).

AOC Start-up Date: 1946 (CT DEP 1991b)

AOC Closure Date: 1990 (CT DEP 1991b)

Wastes Managed at AOC: No wastes have been managed at this AOC since 1990. Wastes managed at this AOC prior to 1990 include: cyanide wastes, chromium sludge, 1,1,1-trichloroethane, acids and acid sludges, alkaline wastes, solvent base paints - solids, water base adhesive (permuthane adhesive), nickel stripper and sludge, coke breeze, oily sludge, and grinding sludge (CT DEP 1983b, 1984b).

Release Controls: The only secondary containment was the building itself (McDonnell 1992a).

Release History: There are no records of releases for this AOC (McDonnell 1992a). However, during the OSR, lime-yellow colored stains were identified on the concrete floor in several areas.

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AOC DESCRIPTION OUTLINE

AOC Number: #8

AOC Name: Former Hazardous Waste Drum Storage Yard

AOC Status: Evidence of Release (CT DEP 1983b)

AOC Description: A former outside hazardous waste drum storage yard located west of building No. 420. The drums were stored on a permeable base and had no secondary containment. Stained soil was observed in the vicinity of the drums (CT DEP 1983b).

AOC Start-Up: 1963 (CT DEP 1983b)

AOC Closure Date: 1984 (CT DEP 1984b)

Waste Managed at AOC: The yard contained approximately 500 drums of cyanide wastes, acid and alkaline wastes and sludges (CT DEP 1983b).

Release Controls: There were no release controls reported (CT DEP 1983b).

Release History: Approximately 35 percent of the drums were rusted, uncovered or leaking (CT DEP 1983b). The area is now a vacant grass and dirt lot (McDonnell 1992b).

AOC DESCRIPTION OUTLINE

AOC Number: #9

AOC Name: Plating Lines

AOC Status: Evidence of Release (McDonnell 1992a)

AOC Description: Plating lines are located in Buildings 7, 33 and 314. The plating operations consist of a series of dip baths that clean, electrostatically plate and rinse parts. Two degreasing units that use 1,1,1-trichloroethane are located in Building 7 (McDonnell 1992a; CT DEP 1991b).

AOC Start-Up Date: 1902 (McDonnell 1992a)

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: The plating operations utilize hydrochloric acid, sodium hydroxide, chromium solution, zinc chloride, nickel, copper cyanide, brass cyanide and sodium cyanide (CT DEP 1991b; McDonnell 1992a). Six 55 gallon drums of 1,1,1-trichloroethane were identified adjacent to the degreasing unit (McDonnell 1992a).

Release Controls: All of the plating lines have concrete troughs beneath the dip baths. These troughs collect any drippings or spills and rinsewaters. The waste liquid from these troughs is pumped out and treated in the wastewater treatment system in Building 30 (McDonnell 1992a).

Release History: There are three recorded releases from the plating lines. On June 3, 1985, 100 to 200 gallons of rinse water from the brass plating and copper-tin lines overflowed from the sump because of a pump failure (CT DEP 1985b). On October 8, 1987, a hose failure caused a release of approximately 25 gallons of rinse water from an electroplating operation (CT DEP 1987a). On November 12, 1990, a sump overflow caused a release of approximately 20 gallons of rinse water from an electroplating operation (CT DEP 1990c). The only release to have a possible impact on Piper Brook was on November 12, 1990 (CT DEP 1990c).

AOC DESCRIPTION OUTLINE

AOC Number: #10

AOC Name: Underground Storage Tank Containing Petroleum Naphtha

AOC Status: Low Potential of Release (McDonnell 1992a)

AOC Description: The UST is a 525 gallon steel tank. According to a Stanley representative, the location of the tank could not be determined (McDonnell 1992a).

AOC Start-Up Date: 1950 (CT DEP 1991)

AOC Closure Date: 1950 (CT DEP 1991)

Waste Managed at AOC: Stanley stored petroleum naphtha in the 525 gallon UST (CT DEP 1991).

Release Controls: There were no monitoring systems noted for this UST (CT DEP 1991).

Release History: There are no records of releases from this AOC (McDonnell 1992a).

AOC DESCRIPTION OUTLINE

AOC Number: #11

AOC Name: Painting Operations

AOC Status: Evidence of Release to Air (CT DEP 1985c, 1988, 1989c)

AOC Description: Painting operations (AOC #11) occur in Buildings 1, 3, 7 and 107. Stanley's painting processes include paint dip lines, which use curing ovens to dry the painted parts, and spray paint booths. Cleaning lines that are used to prepare parts prior to the painting utilize sodium hydroxide and rinse waters. Rinse waters are discharged to the wastewater treatment system (McDonnell 1992a).

AOC Start-Up Date: Unknown. No file or site contact information was available (McDonnell 1992a).

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: As of June 30, 1991, all paints have been converted to waterbase. Stanley no longer uses lacquer thinners, toluene and methyl ethyl ketone (CT DEP 1991b).

Release Controls: Release controls consist of dry filtration systems (CT DEP 1991b). Curing ovens are vented to the outside. According to Stanley representatives, these operations have air permits. However, no permits were encountered in the files (McDonnell 1992a).

Release History: On July 23, 1985 and August 8, 1989 violations for the emissions of various organic compounds that exceeded the limits permitted by the Administrative Regulations for the Abatement of Air Pollution (CT DEP 1985c,d,e,f,g; CT DEP 1989).

AOC DESCRIPTION OUTLINE

AOC No: 12

AOC Name: Degreasing Units

AOC Status: Low Potential of Release (McDonnell 1992a)

AOC Description: Two vapor degreasing units that use 1,1,1-trichloroethane are located in Building 7.

AOC Start-Up Date: 1970's (McDonnell 1992a)

AOC Closure Date: Present (McDonnell 1992a)

Wastes Managed at AOC: Stanley uses 1,1,1-trichloroethane in the two degreasing units. The quantity of waste 1,1,1-trichloroethane generated is approximately 275 gallons per year (CT DEP 1991a).

Release Controls: Release controls consist of level indicators with automatic shut off switches (McDonnell 1992a).

Release History: There are no records of releases from this AOC (McDonnell 1992a).

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APPENDIX B

**STATE AND FEDERALLY
ENDANGERED AND THREATENED
SPECIES**

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Number of Natural Diversity Data Base Points (NDDB) within four miles of site: 10

No NDDB points within 0.25 mile radius of site.

No NDDB points within 0.25 and 0.5 mile radius of site.

No NDDB points within 0.5 and 1.00 mile radius of site.

1 NDDB points within 1.00 and 2.00 mile radius of site.

<u>Common Name</u>	<u>Date*Status**</u>
Squirrel Corn	1935T

4 NDDB points within 2.00 and 3.00 mile radius of site.

<u>Common Name</u>	<u>Date*Status**</u>
Goldies Fern	1910T
Squirrel Corn	1991T
Tall White Bog Orchid	1900SC
Smooth Green Snake	1946

5 NDDB points within 3.00 and 4.00 mile radius of site.

<u>Common Name</u>	<u>Date*Status**</u>
Puttyroot	1897SC
Ebony Sedge	1898
Hartford or Climbing Fern	1917SC
Peregrine Falcon	1935E /SA
Dwarf Rattlesnake Plantain	1894SC

* Date = date of last observance

** Status (First Entry) = State Status

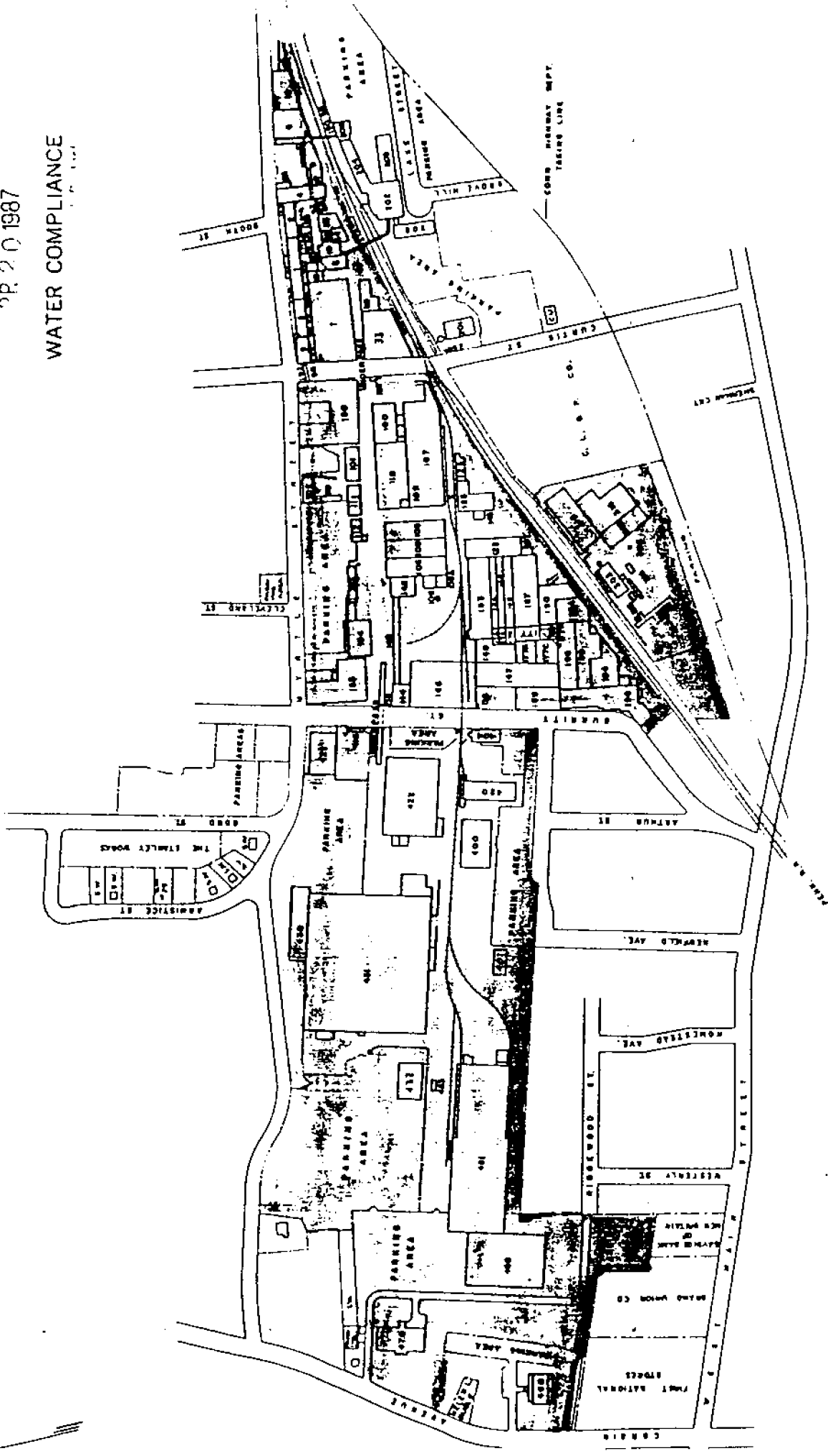
** Status (Second Entry) = Federal Status

SC: Special Concern
R: Endangered
T: Threatened

July 8, 1992

APPENDIX C
FORMER BUILDING LOCATION
SITE DRAWING

WATER COMPLIANCE



THE STANLEY WORKS
MAIN PLANT
NEW BRITAIN, CONN.